IV. DETAILED RECOMMENDATIONS AND TASK FORCE VIEWS

The remainder of this report presents the detailed analysis and recommendations of the Comp Plan Assessment, including Task Force feedback on each recommendation. A final section summarizes the next steps to be taken by the District as these recommendations are considered.

The analysis and recommendations are organized into five categories:

- Determining whether a major revision is needed
- Making the Comp Plan more functional and dynamic
- Clarifying the Comp Plan's relationship to other plans
- Assessing how to improve implementation of the Comp Plan
- Assessing how to improve the amendment process
- Considering the merits of a planning commission

The information under each category is presented in the following format: 1) questions to consider; 2) synopsis of analysis (initial input from the Task Force and stakeholders, consultant analysis, and lessons learned from other cities); and 3) OP recommendations and Task Force views. Please note that one Task Force member asked that the following editorial clarification be made about this report: Task Force member comments have been excerpted and do not necessarily reflect the individual views of each person on the Task Force on each issue.

The Office of Planning, however did make sure the range of views and opinions expressed by the Task Force are represented in the "Task Force Views" sections of this report, as it is important for readers to understand the full range of opinions held by the group.

Determining Whether a Major Revision is Needed

Questions to be Resolved

- How well does the Comp Plan address current issues facing the District?
- Are the Comp Plan's recommendations supported by detailed analysis of issues and trends?
- Is the Comp Plan well organized, graphically pleasing, easy-to-use and read?
- Does the Comp Plan need to be revised or should the Mayor initiate the existing amendment process?

Synopsis of Analysis

Initial Task Force Ideas

Based on the initial review and discussion of the content and relevancy of the Comp Plan to the issues facing the District, Task Force members had the following initial ideas and thoughts:

How Well the Comp Plan Addresses Current Issues

- The Comp Plan does not adequately address the issues facing the District today.
- Numerous issues should be addressed in the next version of the Comp Plan.

The Appearance of the Comp Plan

- It should be user-friendly. It should be designed for easy use by citizens, interest groups, elected officials, and agency staff.
- It should contain attractive maps and graphics.
- It should contain clear, simple text. The Plan must be readable, unlike the current Comp Plan, which is perceived as cumbersome.

The Organization of the Comp Plan

- It should be better organized.
- It should begin with a clear problem statement.
- It should relegate detail to appendices (ideas for appendices ranged from technical data to any policy language beyond the story).
- It should avoid a "legislative" format.

Overall Reflections

- Majority of members recommended that the District significantly modify the Comp Plan.
- Several members suggested that we "throw out the Comp Plan" and start over.

Stakeholder Feedback

A series of external stakeholder interviews (with neighborhood, business, institution, and special-interest leaders) was conducted to learn how the Comp Plan is used in planning, development, and policy decision-making. In addition, focus groups were held with internal stakeholders (District government officials). Their comments on how the plan is used are summarized below.

Feedback from External Interviewees

- Provide background data on issues and trends to help illuminate the issues.
- Many weaknesses cited: too big, not written well, lacks clarity, full of contradictions.
- The Comp Plan is not used to establish and implement agendas across the city.

Feedback from Internal (Government) Interviewees

- The Comp Plan is silent or does not offer adequate direction on issues of high concern to the citizenry and the current administration.
- Officials are concerned about the Comp Plan's format and construction.

Consultant Analysis

How the Comp Plan Addresses Issues Facing the District

- Issues facing the District today, such as housing affordability, transportation, and public facilities, are not well addressed.
- No Parks Element, very weak Public Facilities Element, little or no discussion of growth or redevelopment potential and capacity, little discussion of regional context.
- Comp Plan lacks visual relationships to places within the District, thereby detaching the plan from its context, weakening its goals and objectives and its overall credibility.

How the Comp Plan is Organized and Written

- The Comp Plan is all text, in a legalistic format, with no sidebars, appendices or executive summary. The format's legal drafting conventions make it difficult to read.
- Each element is formatted in a similar way:
 Declaration of major policies are followed by a
 goal statement, followed by a statement of
 objectives, followed by specific policies. There is
 no direct correspondence between the policies
 and goals.
- Objectives range from very general to very specific. Most objectives are broad but in elements such as Economic Development, Downtown and Land Use, more specific objectives are listed and very place-specific actions are recommended.
- The language is jargon-free but it is very dull reading.

How the Comp Plan's Recommendations Are Supported By Analysis of Issues and Trends

- No analysis of regional or citywide population and employment growth trends are included in the Comp Plan.
- Goals and objectives typically are not supported by data. When data are provided, they are in

- narrative form and not supported by charts, graphs or tables.
- Generalized Land Use Map does not highlight differences from current land use or zoning and thus is limited in expressing change.

Other Cities

The Office of Planning staff researched Comp Plans in other cities to define best practices for planning. This analysis also assessed the strengths and weaknesses of those cities' plans and identified lessons that could be applied to the District in the update of its Comp Plan. The other cities included Seattle, Portland, Minneapolis, Denver, Kansas City, Atlanta, Boston and London.

Many of the cities researched had revised their Comp Plan because issues and trends had changed or because it was just too out of date.

- In Denver: The city faced substantially different circumstances at the end of the 1990s than it faced in the 1980s. These differences included changes in population, economics, and the federal welfare program.
- In Minneapolis: While the metropolitan region had been growing steadily over the past 25 years, the population within the city of Minneapolis had decreased since the 1950s. The new plan thematically focused on becoming a growing city.
- In Kansas City: The last Comp Plan was developed in 1947 and was in need of updating. The revised plan focused on interconnected strategies, clear criteria for making decisions, and included over 600 specific action items.
- In Boston: The last Comp Plan was developed in 1965. The Mayor wanted a bold new citywide plan that actively sought the involvement of people all over the city.

Office of Planning Recommendations and Task Force Views

As the First Step, Create a Clear Vision for the City

A key step in the Comp Plan revision will be to create a vision and policy framework that helps identify the future direction of the city. This effort would identify the major challenges facing our city today, articulate how the city has changed demographically, and establish broad strategies for addressing key issues. The findings and recommendations would be included in one of the first chapters of the revised Comp Plan.

The development of this framework would be informed by an analysis of issues and trends relating to land use, housing, demographics, real estate, transportation, economics, and the environment as well as other issues. The framework would cover a full range of physical and economic issues that are linked to improving our city. Key social issues that have spatial aspects (e.g., community or health centers in schools) also will be covered. In addition to expressing the concepts through maps, principles

that help articulate this framework in more detail will be identified (such as connecting neighborhoods to the waterfront or providing neighborhood-serving retail in particular areas of the city).

Overall, this effort would:

- Define the major challenges facing Washington, D.C. as a city.
- Define our role within the region and our expectations about how this role should change in the future.
- Include a thorough analysis of trends and projections.
- Provide a coherent spatial framework that articulates the future direction of the city.
- Re-evaluate the major themes in the current Comp Plan.

Task Force Support for Creating a Vision

Task Force members expressed substantial support for developing a clear vision for the District. Many expressed support similar to these Task Force members' statements:

"Must have an overarching idea of what we hope our city can be, a central organizing principle that can perform as umbrella under which the various currently existing "plans" can be reconciled and coordinated."

"It will allow us to have a forest whenever we are lost in the trees. It reminds us what we agree on whenever we are incapable of resolving disagreements."

"Existing Themes could be re-examined. My point is that current documents(s) have vision policies established in 1984 for a 20-year outlook. Revise/modify/update yes."

Diverse Viewpoints

Although all Task Force members supported the idea of a "Vision," there were a few concerns. These are best expressed by this Task Force member's statement: "A SHORT introductory vision for the city could provide a useful context for the plan, if such a vision is based on existing facts and circumstances, and reliable trends. Inherent difficulties exist, however, in formulating a unified vision for any city divided on economic/ethnic lines, as in Washington. No credibility will attach to a generalized "shining city on a hill vision" that promises the best of all possible worlds to all residents. There's a place for that level of aspiration, but it isn't in a statutory plan. An effective vision statement will of necessity contain limits and boundaries as well as goals."

Embark on a Major Revision of the Comp Plan

Based on the direction established by the vision and policy framework, revise and update the Comp Plan. While some policies are still relevant and should be carried forward, a major revision is necessary to make the Comp Plan a useful and effective document for public and private decision-makers. The Comp Plan was written 20 years ago and inadequately addresses many key issues facing the District today. The Comp Plan is also currently drafted in a legal format, which makes it a very difficult document to understand and digest.

The revised Comp Plan would tell a story that helps to guide and inspire activities in the District. It would be based on and include an analysis of key trends, issues, and opportunities that would be examined as part of the development of the vision and policy framework. Its recommendations and policies would be linked to this analysis to ensure that the recommendations are substantiated.

The Comp Plan would be reduced in size, developed in a more user-friendly format and writing style, and contain numerous graphics and maps that clearly communicate intent.

While this revision is underway, the current Comp Plan will remain in effect and will provide guidance to District agencies, the Zoning Commission, the City Council, and others.

The work program for completing this revision would include the following tasks:

- Prepare Detailed Work Program. A more detailed work program would be developed in March and April 2003, if agreement on the recommendations in this document is received from the Mayor and Council.
- 2. Develop and Implement Citizen and District Involvement Programs. This would include the development of a public involvement process that includes public meetings and an information network such as a website and newsletters. In addition to working with the public, OP would work with other District agencies to share and review information and ensure that these agencies are vested in the final product. A public education and outreach program would precede formal community meetings.

- 3. Data Collection and Analysis. This task would include data collection and analysis of land use, demographics, transportation, economics, environment, historic resources, housing, parks/open space, public facilities and other topics and would be used to inform and develop the vision and policy framework as well as the overall Comp Plan.
- Conduct Policy Audit. An inventory of policies in the existing Comp Plan and other local planning documents would be conducted, including an appraisal of the continued relevance of each policy.
- 5. *Prepare Vision and Policy Framework.* Refer to the first recommendation in this document, "As A First Step, Create A Clear Vision for the City".
- Prepare and/or Revise Policies and Maps. This
 represents the "heart" of the Comp Plan revision
 and would include the drafting of new policies,
 map modifications, and action programs.
- 7. Implications Assessment. The purpose of this task is to assess the implications of expected growth on transportation, other public infrastructure, the environment, and land uses. This assessment would likely include some social aspects (such as assessing if Community Based Residential Facilities are over concentrated in some areas).
- 8. Prepare Working Draft Plan. This task would cover the mechanics of producing a working draft plan, including the preparation of narrative text, maps, and tables. It also would include refinement of goals, policies, and programs based on the above assessment. Elements of the Working Draft would be circulated among OP staff, other District departments, and the public for review and comment.
- Prepare Public Review Draft Plan. Production of the public review draft is envisioned to be an iterative process. Elements of this draft would be circulated among OP staff, other District departments, and the public for review and comment.

10. Adoption. The Comp Plan would be submitted for Council adoption no later than January 2006 and would be adopted in early-mid 2006. A final document incorporating any changes made during the adoption process (including those relating to Congressional and NCPC review) would be printed following adoption. NOTE: If a Planning Commission were established, it would review the draft Comp Plan in key stages including the Working Draft and the Public Review Draft. It would also hold public hearings, and make recommendations to the Mayor and/or Council. The timeline (Figure 1) does not show the time impact of a Planning Commission.

Task Force Support for Revising the Comp Plan

Most Task Force members agreed that the Comp Plan needs a major update. The thoughts of many could be captured in these statements:

"Document needs a major overhaul. It is entirely out of date."

"Discussions have made clear that a top-to-bottom revision is necessary, if only to make the document and the process more accessible and more predictable."

Diverse Viewpoints

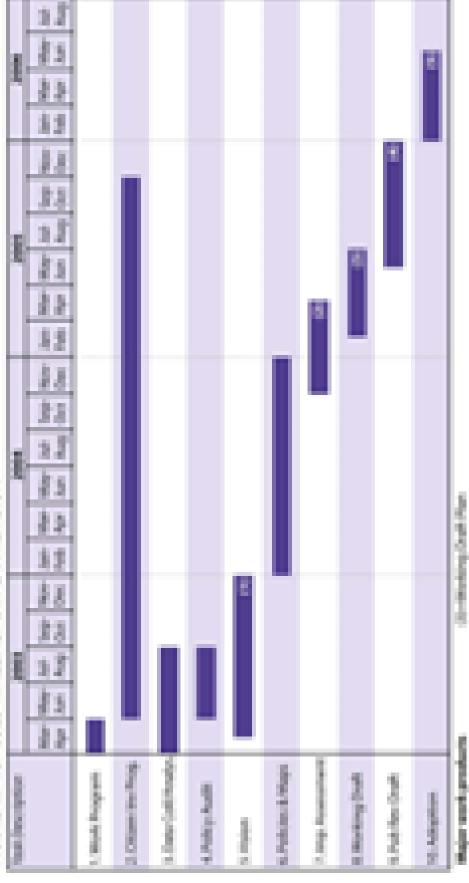
There were a few dissenting voices:

"We might need a revision but not major, the Comp Plan needs to be improved."

"Absent evidence or clear explanation that a new approach will address specific problems with the plan, [we] support the Comp Plan and its processes in its current form."

"There needs to be a careful review, which doesn't completely junk what we have." "Over the years because of failings of city leadership, there has not been an attempt to simplify, eliminate contradictions, and implement."





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Making the Comp Plan More Functional and Dynamic

To create a more functional and dynamic Comp Plan, both the content and structure of the existing document need to be modified.

Improving Plan Content

The Office of Planning focused its recommendations on determining the type and intent of the Comp Plan and establishing clear priorities within the Comp Plan.

Questions to be Resolved

- What type of Comp Plan should the District have? Policy? Vision? Agenda? Design Plan? Strategic? Other?
- Should the Comp Plan focus on the city's physical growth, (re)development and economy or should it also address social issues?
- How specific should the Comp Plan be? Should the Comp Plan provide broad, citywide policy guidance as well as more site-specific guidance?

Synopsis of Analysis

Initial Task Force Ideas

During the analysis process, Task Force members were asked for their initial ideas and thoughts regarding the content of the Comp Plan and how it should be improved. Comments from the members are highlighted below.

The Type of Comp Plan

- It should address social issues as well as physical (land use) issues.
- It should maintain a "big picture" focus and avoid minutia.
- It should contain policies that are less openended and are based on substance.
- It should retain the principles in the current Comp Plan, which are still valid, but present them in an easier-to-understand format.

The Intent of the Comp Plan (e.g., what the Comp Plan should accomplish)

- It should communicate the District's vision and values for a defined time period. It should be results-oriented, clearly establish local priorities, and easier to implement.
- It should tell the District's "story," and should engage and motivate the reader. It should provide a positive outlook.
- It should guide future public and private investment.
- It should promote the livability of the city and its neighborhoods.
- It should include strategies for improving life in neighborhoods, bringing families back to DC, and repopulating the District.
- It should provide a framework to guide future land use decisions. These decisions include the

future of large undeveloped or undeveloped tracts, and the siting of Community Based Residential Facilities (CBRFs) and other contentious land uses.

The Issues the Comp Plan Should Address

- The most frequent issues mentioned were affordable housing, neighborhood revitalization, land use and growth, education and human services, the relationship with the federal government, public facilities, transportation, and the environment.
- One or more Task Force members identified the following additional issues as appropriate for discussion in the Comp Plan:
 - Linkages to other plans (transportation, etc.)
 - Guidance in the development of specific large sites
 - Fiscal challenges
 - Parks
 - Homeland security and public safety
 - Health care
 - Employment and economic development
 - Maintenance of public facilities
- The Comp Plan should focus on policy issues rather than administrative and city management issues.

Improving the Credibility of the Comp Plan

- It should be more clearly based on technical analysis, reflecting the most current available data (including the 2000 Census).
- It should be "owned" by the residents of DC, in other words, built through bottom-up, broadbased citizen participation (one member suggested the "question mark period" like Minneapolis).
- It needs to have agreement and commitment from the Mayor and City Council.

Differences of Opinion on the Comp Plan's level of detail:

- → Some felt it should be first and foremost a vision document.
- Others were concerned that a "vision" could gloss over important neighborhood issues.

Stakeholder Feedback

Feedback from External Interviewees

- Comp Plan is used primarily to defend or support development proposals at the block level.
- Only select individuals understand and use the Comp Plan.
- Some say government is using the Comp Plan, others firmly state it is not.
- Land use elements were cited as most useful.
- Determine the level of specificity of the Comp Plan – 40,000 feet? 5,000 feet?

Feedback from Internal (Government) Stakeholders

 Most were unfamiliar with the Comp Plan and some were unaware it existed (most officials were hired during Mayor Williams' administration).

Consultant Analysis

Statutory Purpose of the Comp Plan

- District statutes vest the Mayor with power and authority to initiate, develop and submit the Comp Plan to City Council for adoption. Council adopts the Comp Plan and subsequent amendments.
- Scope is defined broadly Comp Plan can include elements addressing land use, urban renewal and development, public works improvements, physical, social, economic, transportation and population.

Background on Type and Intent of Comp Plans Comp Plans can have three types of content:

- Physical Plan: the physical city: land use, housing, transportation, public facilities, economic development, parks and recreation, and environment.
- Social Plan: the social city: education and literacy, poverty issues, homelessness, and public health.
- Hybrid: combination of both.

Comp Plans Can Include One or More of Five Different Possible Approaches ("Intents")

- Agenda: Action plans that record a "to-do list."
- Policy: Establish a straightforward framework for action, such as "if X happens, then Y must be done."
- Vision: Provide an image of what could or should be but defers strategies to get there.
- Design plans ("one solution" plan): Provide the detailed working-out of all of the pieces of the vision on paper.
- Strategic plans (alternative scenarios): Develop contingency decisions and actions.

The Type of Comp Plan the District Has

- Primarily a policy document with large sets of goals, objectives and policies.
- Also an agenda plan, which includes a list of desired actions.
- Provides policies on both physical and social elements. Social issues are secondary.
- Does not contain maps other than a Generalized Land Use Map and the Generalized Land Use Policies Map.

Other Cities

The Office of Planning staff researched comp plans in other cities to define best practices for planning. These cities included Seattle, Portland, Minneapolis, Denver, Kansas City, Atlanta, Boston and London. The following provides a summary of what was learned from this analysis related to the types of Comp Plans and what they accomplish for these cities.

Type of Comp Plan

The majority of the cities evaluated have hybrid plans – addressing both physical and social issues. Many cities stress that creating a more "holistic" plan is fundamental to improving the health and welfare of all aspects of their city.

Intent of Comp Plan

Most cities have a combination of types in order meet a variety of particular objectives. While most plans include many "intents", the bullets below highlights the core formats that drive the plan:

- Agendas are the most common type, with some cities providing a matrix or a detailed listing of actions after each goal.
- Policy-type plans are also quite prominent, and the cities that used them wanted to clearly articulate strong directives for the long-term.
- Vision and design plans are less common but when used, provide verbal or illustrated guidance for moving the city forward to a new direction. In reviewing the plans, it was these types of plans that were the most compelling, motivating, and understandable.

Office of Planning Recommendations and Task Force Views

Make the Comp Plan a Hybrid Plan (primarily physical with the "spatial" aspects of social issues)

The Comp Plan would focus primarily on physical and economic aspects of the city and include policy direction on land use, economic development, urban design, transportation, historic preservation, housing, parks, recreation and open space, natural resources and environmental quality, and the siting of public facilities. The Comp Plan should also address the "spatial" aspects of social issues, in other words, the physical or geographic implications of these issues. An example could be a policy that considers siting of small health facilities within schools to better address chronic health issues or policies that encourage childcare facilities within new commercial projects. This could also include

coordination and consistency with emergency preparedness plans, such as the location of shelters and evacuation routes.

In some instances, existing social-oriented plans that provide further guidance on these issues would be referenced. In other words, if the Comp Plan provides direction on health facilities and/or community centers in schools, it may reference another plan that directs the pure "social" equation or operational aspects of that topic (i.e., see "XXX Plan"). Policies in the Comp Plan would not speak to purely social issues such as how to improve Medicaid services in the District.

Task Force Support for Making the Comp Plan a Hybrid Plan (Physical with "Spatial" Aspects of Social)

There is general Task Force support for a plan that focuses primarily on physical and economic issues with policy guidance on social issues limited to the spatial component of those issues. One member expressed this as follows: "The Comp Plan should be land use with some "spatial" aspect of social issues (no human services element, no public safety element)."

Commentary was also made about the current Comp Plan: "It is a hybrid plan now (sections 101-111) – look into the table of contents. The update could make the text more compatible with social/economic and physical aspects of land usage."

Diverse Viewpoints

One Task Force member commented: "...one of the possible contributing factors to the current Comp Plan's weaknesses is its effort to be all things to all people. Strategic direction on social issues would only be helpful as they relate to land use planning."

Establish Priorities Within the Comp Plan

The Comp Plan should set priorities among the recommended actions and identify who would be responsible for implementation – in the form of a "to do" list. It is important to indicate what needs to be done in the short-, mid-, and long-term. city officials and external stakeholders need to understand the

priorities so that implementation can be monitored and the responsible District government agencies can be held accountable. This to-do list would be modified when the Comp Plan is being amended to keep the lists up to-date and accurate.

Task Force Support for Establishing Priorities

There was generally agreement among Task Force members on this recommendation. Comments that were made included:

- "Agree, pretty obvious"
- "Agree, current plan does not do this."
- "Not for everything just immediate priorities to lead us toward our long-term plan."

Diverse Viewpoints

The Comp Plan should "not be a task list."

"A 'to do list' will only be appropriate if the Comp Plan is created as an agenda plan. The question of who would set the priorities and who has the authority to change those priorities are large issues that must be discussed further."

Improving Plan Structure

This is the second method for creating a more functional and dynamic Comp Plan.

Questions to be Resolved

- Is the current internal framework effective (General Elements, Ward Plans, Small Area Plans?)
- Are there inconsistencies between these plans and if so, how are they reconciled?
- Is the role and relationship between the plans appropriate, in light of the answers above?

Synopsis of Analysis

Initial Task Force Ideas

Conflicts and/or Inconsistencies in the Comp Plan

- There are internal conflicts in the Comp Plan, particularly between the Ward Plans and the General Elements (citywide plan).
- The Plan should use a consistent set of subarea boundaries, rather than the multitude of boundaries that appear in existing planning documents (SNAPs, small area plans, Ward plans, etc.).

Differences of Opinion: The continued use of Ward Plans within the Comp Plan.

- → The Ward Plans help build neighborhood identity.
- → They foster Council "buy-in" and are politically driven.
- ← They are "wish lists."
- Ward boundaries are subject to change, making these plans impractical.
- There are already Small Area Plans and Special Treatment Area Plans, creating the potential for redundancy and inconsistency.

Stakeholder Feedback

Feedback from External Interviewees

- Reconcile the contradictions.
- Fix the maps so the "blurry areas" are clarified.
 This would help eliminate a lot of the controversy on the ground.

Consultant Analysis

District Comp Plan Components

- District Elements (all other lands and local municipal functions), divided into two parts:
 - General Elements with citywide focus.
 - Ward Plans (cover same issue areas as general elements but relate to local issues within each ward).
- In addition, Small Area Plans that serve as "supplemental guidance" to the Comp Plan can also be proposed and adopted. These Small Area Plans may include zoning recommendations, financing strategies, recommendations on special taxes, designs or other regulatory interventions, and implementation tools.

 Many broad policies and objectives and several place-specific policies are not consistent across the Comp Plan. Stakeholders can pick and choose items that support their positions. The Comp Plan does not include cross-references among items.

The Ward Plans

- Internal inconsistencies in the Comp Plan between General Elements and Ward Plans.
- Ward Plans are often lists, not plans.

Other Cities

The Office of Planning staff researched Comp Plans in other cities to determine whether similar ward plans had been developed and further, how neighborhood plans (e.g., Small Area Plans) related to their Comp Plans. No other city researched had developed Ward Plans. The cities researched are Minneapolis, Seattle, Denver, Raleigh, Phoenix, and Kansas City.

CHART 1: NEI	GHBORHOOD PL	ANS IN OTHER	CITIES (COMPAI	RABLE TO AREA F	PLAN CONCEPT)	
	Minneapolis	Seattle	Denver	Raleigh, NC	Phoenix	Kansas City
Description of the Neighbor- hood Plans (depth, breadth)	Master Plans for neighborhoods can be of any size; some are of one neighborhood; some cross neighbor- hoods; city manages the funding and neighborhood develops the plan.	Because of state law Comp Plan is kept very broad; neighborhood section is only broad goals re: neighborhoods.	Neighborhood plans address issues and opportunities at a scale that is more refined and more responsive to specific needs than city's Comp Plan.	They have Small Area Plans; their size can vary and they often deal with many issues, such as watershed, highway, corridor issues, etc.	Area Plans, which are more detailed plans.	They have area plans; specificity of plans vary based on the types of issues – but they try to cover at least some general topics.
Do they have Issue- based plans as well as Neighbor- hood Plans?	Yes; treated with the same regard as the neighborhood master plans.	Yes	Yes; they have corridor plans.	Yes	Yes; other agencies develop plans that become of the comp plan (parks plans, etc).	Yes; they also have corridor plans.
Are Neighbor- hood plans adopted as part of the Comp Plan?	No; They must be consistent to the Comp Plan; but once neighborhood plan is developed, the Comp Plan may need to be modified.	No; neighborhoods actually develop the plans themselves; this is one key reason why they are not part of the Comp Plan.	Yes; they are supplements to the Comp Plan, which is an addition to the Comp Plan as opposed to an amendment.	Yes; neighborhood plans also outline some recommend- ations for implementation.	Yes; they are adopted as part of the General Plan (their Comp Plan).	Yes; the area plans are part of the Comp Plan – they define the goals in the Comp Plan more specifically in those areas.

Office of Planning Recommendations and Task Force Views

Revise the Citywide Elements and Incorporate Relevant Policies from the Existing Ward Plans into the Citywide Elements.

The Comp Plan should: 1) be organized around major themes to better tell a story; these themes would be a unifying device, 2) make the ideas of the plan more accessible using graphics and maps throughout, and 3) allow users to find information and recommendations more easily.

The citywide recommendations should be broad enough to apply to multiple situations. However, the citywide elements should also include more specific guidelines for siting various types of facilities, and uses. Some of these could include large sites, various public and community facilities and institutions. What the Comp Plan will not do is dictate specific development standards for individual lots. The intent of the citywide portion of the Comp Plan should be to articulate important policies to help realize the vision and to include clear strategies and "to-do" lists that identify those implementing tasks.

Currently, there are many policy issues articulated in the Ward Plans that should be addressed by citywide policies. One such example was raised at the January 28th Roundtable – the Tree and Slope Overlay. Another example pertains to the Ward Plan policy to enhance "older established residential neighborhoods and areas, including ...Logan Circle, Shaw, Dupont Circle...." This concept should be incorporated into a citywide element to ensure that similar neighborhoods across the city are also addressed.

Develop Area Plans and Incorporate Relevant Policies from the Existing Ward Plans into these Plans. Eliminate the Ward Plans.

While there was value in developing the Ward Plans – providing a framework for neighborhood-oriented planning in the city – it is recommended that they now be replaced by the citywide elements and "Area Plans." Review of the Ward Plans suggest that there are deficiencies and that the city would be better served through focused planning in smaller geographic areas. Such planning should provide greater guidance for implementers and decision-makers. Area Plans would be adopted by legislation and have the same legal authority as the citywide elements of the Comp Plan. An official finding of consistency with the citywide elements would be required prior to the adoption of every Area Plan.

Area Plans can also span several neighborhoods in order to address a particular issue or conflict. They can also be issue-specific (such as one plan addressing multiple corridors), as many of the challenges are similar in areas across the city. This determination will be made at the start of the planning phase. This flexible model has been used successfully in other cities across the country including Kansas City, Phoenix, Raleigh, and Denver.

The chart on the next page illustrates the intended goals of any type of sub-area plan (this could be Ward Plans or Area Plans) and:

- How each goal is addressed by the existing Ward Plans.
- How each goal could be addressed by Area Plan.

Review the Comp Plan Maps

Undertake a review of the Comp Plan maps as part of the process for revising the Comp Plan.

³ Excerpt from Section 1327.1 of the Ward 2 Plan.

CHART 2: SUBAREA PLANN	ING GOALS AND APPROACHES	
Goals of Sub Area Plans (Ward or Area Plans)	How this Goal is Addressed by the Ward Plans	How this Goal Could be Addressed by Area Plans
Interprets citywide policies at a more localized level but does not prescribe specific zoning (Zoning Commission function).	Provides policy/planning guidance at the ward level. Some policies are too broad to provide any substantive guidance and would be more appropriately addressed at the citywide level. Some Ward Plans provide detailed zoning recommendations.	While guidance will be more detailed and provide direction for the Zoning Commission, it will suggest ranges (as opposed to specific zoning) or will suggest what should generally occur in areas. This will allow the Zoning Commission to determine the appropriate zoning strategy.
Provide unique guidance for areas in the city. Emphasis is often placed in areas where: There are land use issues or conflicts There is rapid growth or growth pressure There is a need for coordinated development.	All neighborhoods in the District are theoretically covered by Ward Plans. Some Ward Plans provide more detail on neighborhoods while other neighborhoods have no guidance ⁶ –rationale for selection is sometimes unclear.	Size and location is flexible depending on the issues. While the area plan concept would not cover every neighborhood of the city, a rational system for how Area Plans are selected will be used. This means that in areas that currently have little detailed guidance in Ward Plans but should (e.g., portions of Ward 5), Area Plans would be developed to address specific issues. Areas that do not have an Area Plan will be governed by the citywide elements.
Address issues of local importance in a way that is consistent with the citywide elements.	Some Ward Plans include policies that conflict with citywide policies. The Comp Plan stipulates that the Land Use Element should be given greater weight than the other elements (including Ward Plans), limiting the power of the Ward Plans. ⁷	The Area Plans would have same legal status as the citywide elements (adopted as legislation and part of the Comp Plan). Land Use Element policies would no longer have greater weight than other elements. For this reason, it is imperative that Area Plans are in conformance with the citywide elements. In fact, a formal finding of consistency with the citywide elements would be required prior to the adoption of every Area Plan.
Create all sub area plans with the same level of quality, using consistent methodologies and data.	Quality varies greatly with Wards 1, 2, 3, and 6 having the most detailed Ward Plans.	Area Plans will have a baseline level of analysis including demographics, land use analysis, articulation of key issues/challenges, recommendations, and a description of how recommendations are in alignment with the citywide elements. Community input would be solicited in the development of all Area Plans.

⁴ For example, the Ward 4 Plan states to "protect and improve the ward's natural and man-made environment"

⁵ For example the Ward 6 Plan provides details such as "...Increase to 3.0 FAR on H street, NE from Benning Road to 8th Street, SE" ⁶ For example, the Ward 5 plan provides little guidance to specific neighborhoods while the Ward 2 plan provides specific guidance to 11 neighborhoods, such as Dupont Circle.

⁷ Section 112.1(c) of the Comp Plan.

Task Force Support for Revising the Internal Structure of the Comp Plan

There was general Task Force support for the notion of a small, clear family of plans that have clear linkages among one another and are explainable to the general citizen. Most members also favored elimination of the Ward Plans. There was support for the idea of area plans for some areas/neighborhoods of the city. There was a strong feeling among most members that whatever replaced Ward Plans should have the same legal status, legislatively enacted and carrying the same authority as the citywide elements of the Comp Plan.

Comments on the Ward Plans included: "In context to the city's planning needs (at least as I've come to understand them) the concept of "family plans" and the elimination of Ward Plans makes a great deal of sense."

- "I totally support the elimination of Ward Plans and replacement of those plans with neighborhood plans for some but not all neighborhoods."
- "When you think in terms of a particular ward you tend to think less about how neighborhoods relate to the city as a whole and to important city goals and issues."
- "I agree that Area Plans are more productive and, I suspect planning would be more reflective of the "vision" each resident has for the city; the document that results from this exercise will meet with much more enthusiasm, I think."

Diverse Viewpoints

A few Task Force members spoke in favor of keeping the Ward Plans:

- "The Family of Plans concept is a valid tool for explaining how planning should work and tie together for the average citizen how all these different plans come together. Comp Plan and Ward Plans need to be tied together as opposed to small area neighborhood plans."
- "We have a proposal that would throw out the baby with the bathwater. This whole exercise treats Ward Plans as unwanted children. These are our children and they serve and could serve as 'on the ground' controls for planning and development."

Another stated: "We need to get rid of all of the side plans or at least not call them plans. 'Neighborhood' plan might be the word to use."

Other members did not dispute the shortcomings of the Ward Plans but were concerned about the proposal that area plans would be "equal" in stature to the citywide Land Use Element. Two members stated they were "firmly opposed" to this concept. Their position was that this change was unworkable and would make it difficult to locate new parking garages, halfway houses, communication towers, and similar uses that are often the focus of neighborhood opposition.

Clarifying the Comp Plan's Relationship to Other Plans

Questions to be Resolved

- How should other citywide plans such as the Transportation Vision Plan, the Citywide Strategic Plan, Safe Passages, the Consolidated Housing Plan, the Public Facilities Plan, etc. be included or referenced in the Comp Plan.
- What is/should be the relationship between the Comp Plan and the SNAPs?
- What institutional modifications/initiatives are necessary to strengthen the links between the Comp Plan and other plans?
- Do federal issues/interests need to be better integrated into the content of the District Elements?

Synopsis of Analysis

Initial Task Force Ideas

During the analysis process, Task Force members were asked for their initial ideas and thoughts regarding linkages between the Comp Plan and other plans and activities and how these could be strengthened. Comments from the members are highlighted below.

Linkages, Overall

- The Comp Plan should establish citywide baseline data and assumptions that are used consistently by all departments.
- The Comp Plan needs to set forth a definitive land use scenario, upon which other plans are based (and against which development applications are technically evaluated).

Linkages to the Transportation Vision Plan (TVP)

- The TVP should be the "Transportation Element" of the Comp Plan.
- There should be a better link between transportation and land use.

Linkages to the Strategic Neighborhood Action Plans (SNAPS) and Ward Plans

 The relationship between the Ward Plans and the SNAPs should be clarified—there is overlap. Neighborhood planning should be more comprehensive (e.g., it should address the relationship between land use, housing, transportation, etc.).

Linkages to Other Plans and Programs

- Better coordination between the District Elements and the Federal Elements is needed.
- Should also look at linkages to DC Public Schools, university master plans.

Differences of Opinion: The Need for Linkages to Safe Passages/Human Service Strategy

- → Some Task Force members felt we should address human service needs in the Comp Plan.
- → Some members felt we should analyze the physical implications of Safe Passages and public health plans prior to incorporating them.
- Other members believed that human service issues are policy and budget issues, not conventional planning issues.
- Others were adamant that social issues should not be included in the Comp Plan.

Differences of Opinion: Linkages to the Citywide Strategic Plan

→ The Comp Plan should guide the CWSP.

- → The CWSP, as a budget process, should amplify the Comp Plan.
- The intent of the two documents is very different.

Stakeholder Feedback

A series of external stakeholder interviews (neighborhood, business, institution, and special-interest leaders) was conducted to learn how the Comp Plan is being used in planning, development, and policy decision-making. In addition, focus groups were held with internal stakeholders (District government officials).

Feedback from the External Interviewees

 Clearly identify the relationship (and make sure they are truly linked) between the Comp Plan and other plans and policies, including Small Area Plans, CIP.

Feedback from Internal (government) Interviewees

- The Comp Plan does not reflect the TVP. The
 District Department of Transportation hopes the
 TVP serves as the backbone of the
 Transportation Element of the Comp Plan.
- The most important decision with regard to the CWSP and the Comp Plan is how to conceptualize the relationship between the two documents.

Consultant Analysis

Purpose of Linkages

 To ensure that the Comp Plan's policies and priorities are effectively implemented and that there are sufficient resources provided to do this. • To ensure the Comp Plan is informed by and supports related policies and plans.

Overall Finding

 Ideally, all plans would be linked to the Comp Plan, sharing relevant priorities supported by fully coordinated implementation mechanisms. However, most linkages from other plans to the District's plan are weak or nonexistent.

Links to the Citywide Strategic Plan (CWSP)

- CWSP is updated every two years.
- CWSP is more of a budget prioritization document than a full strategic plan.
- No linkage exists between the Strategic Plan and the Comp Plan.

Links to Safe Passages and Human Services Strategy

- Safe Passages is the primary DC human services plan; many other more specific plans.
- Human Services Element of the Comp Plan is weak and little used.

Links to the Transportation Vision Plan

- TVP is robust plan currently being updated.
- TVP not reflected or referenced in Comp Plan; land use implications of TVP not addressed in the Comp Plan.

Links to the Federal Government

 The Comp Plan does not relate at all to policies or maps of the separate federal elements document, even though federal lands make up 40 percent of the District's land area.

Office of Planning Recommendations and Task Force Views

The following outlines some of the linkages that should be made among various city plans and the Comp Plan. There are three categories in which these linkages are to be made and clarified:

Have Key Plans that Guide the Physical Environment Become Part of the Comp Plan

Transportation Vision Plan. For the upcoming Comp Plan revision, the TVP would serve as a basis for the transportation policies in the Comp Plan. In addition, the Comp Plan would build upon the TVP and focus on the integration of land use and transportation objectives. In future updates, the TVP and the Comp Plan would be developed/updated jointly.

Public Facilities. There is currently no citywide public facilities plan (a plan mentioned in the Public Facilities Element of the Comp Plan). The Comp Plan would provide more guidance by identifying the city's public facility needs and articulating broad policies for when and where new facilities are to be sited. If a citywide public facilities plan is developed it should be included in the Comp Plan.

Parks and Recreation. A citywide parks plan does not exist. If that continues to be the case, the Comp Plan would be the plan that identifies the city's park and recreation needs, existing facility locations, and potential locations for new facilities.

Recognize Plans that are to be Informed by or that Inform the Comp Plan (but are Not Elements of the Comp Plan)

The Citywide Strategic Plan (CWSP). CWSP is developed every two years drawing from citizen preferences expressed at the Citizen Summits. The CWSP describes a series of priorities and budget commitments to support action on the priorities. The CWSP is also used to inform performance

contracts with all senior officials in the administration. The relationship between the CWSP and the new Comp Plan should have two aspects: 1) on topics where the Comp Plan speaks with authority, the CWSP would be viewed as an implementation tool and follow the guidance of the Comp Plan; 2) when the CWSP addresses issues outside the purview of the Comp Plan, it would be viewed as the guiding document for the District.

Safe Passages. The Comp Plan would cross-reference relevant recommendations from Safe Passages that relate to the location of facilities. Key recommendations that could impact land use, transportation, housing, or other aspects of growth and development may also be included. Similarly, future updates to Safe Passages and other social service plans should be consistent with the growth projections and general development principles articulated in the Comp Plan.

Strategic Neighborhood Action Plans (SNAPs). As part of the Williams administration, a strategy was developed to identify neighborhood priorities, with the outcome used to inform the District budget. The SNAPs are the documents that articulate those priorities. If SNAPs are to be updated, one option OP would consider is how the process can be used to identify neighborhood priorities specifically for the CIP or to inform the Citywide Strategic Plan. The SNAPs would not become part of the Comp Plan.

Use Common Projections and Assumptions for all City Plans

There needs to be a common understanding of trends and a common set of forecasts that are used by all city agencies for planning purposes. The assumptions included in the Comp Plan about population, housing, employment, etc., should be the same as for all other planning efforts – housing plans, transportation plans, public facilities plans – so that all plans and policies use the same foundation.

Task Force Support for Clarifying Links

Most Task Force members were strongly in favor of strengthening the linkages between plans. Comments included:

- "No-brainer. There must be coordination and these other plans must work to support the Comp Plan."
- "Agree for multi-year, master plans, such as the transportation plan and a parks/open space master plan (if we had one)."
- "Consistency will make them all easier to follow and implement."
- "The Comp Plan should be the unifying element and set overall direction. Other links to more specific, supplementary information begins to create additional paths to reality."
- "Comp Plan should be dominant and other plans should be reconciled to agree with or conform to vision and Comp Plan. My review of SNAPs results makes me think that those were unfettered wish-lists established by the most aggressive activists in some communities not remotely a planning document. It is my understanding that CWSPs are similar."

Diverse Viewpoints

A few members expressed concerns about specific linkages:

"Not all plans should be included but all plans should be aimed at following the Comp Plan."

"Link the major land use plans - not the short term plans and social service plans."

Strengthen the Linkage with Federal Government Planning Efforts

Recommendations include:

- Create a new section of the Comp Plan that addresses the intersection of federal and District issues. Topics could likely include:
 - Federal employment and economic development (maintaining a ratio of federal employment to other employment in the city)
 - Public security and the urban environment (e.g., urban design policies that reflect public and homeland security concerns, and viceversa)
 - Coordinated open space planning
 - Transportation planning
 - Environmental issues

- Comprehensive and coordinated visitors program
- Waterfront development
- Development of federal lands (by use of the federal government as well as the District).
- Accommodating the future needs of foreign diplomats within the District
- Live–near-work initiatives to encourage federal employees to live in DC
- Have the Planning Commission consider and comment on the federal CIP.
- Synchronize the cycles for amending or updating the District elements and the Federal elements of the Comp Plan.

Task Force Support for Strengthening Link with Federal Government Planning Efforts

There was strong support for the idea, although there was some question as to whether this should be in a separate section, infused throughout the document, or both.

Comments included:

- "The District does not exist in a vacuum. The Feds are a fact of life."
- "Should be a coordinated plan."
- "This may grow in importance with security issues. Also, should we think about adding this to linkages with Regional government planning efforts."
- "Obvious we should, we must ..."

Diverse Viewpoints

Some clarifying comments and notes of opposition included:

- "The linkage exists with the Home Rule membership on the NCPC: The Mayor, the Chairman of the Council and 2 Mayor appointees on the Committee. The document as reviewed by the higher level of government tries to establish internal consistency (between District Elements and Federal Elements)."
- "Easier said than done. The long range plan for most federal property is to stay put no change contemplated (or desired) for Rock Creek Park, the arboretum, most of the mall, most existing federal buildings. Maybe 10% of federal land may be subject to changes."

Another member indicated that we should not forget the "flip side" of this issue—that the federal government has an obligation to be more responsive to the District's needs and perspectives as it does its own planning.

Assessing How to Improve Implementation of the Comp Plan

Questions to be Resolved

- How can the Comp Plan and the CIP be linked?
 Which agency should lead this effort?
- How can the Comp Plan and zoning regulations and Map be better linked?
- Is the "shall not be inconsistent" effectively linking zoning to the Comp Plan?
- Plan Monitoring: How often should OP produce a Comp Plan implementation report?

Synopsis of Analysis

Initial Task Force Ideas

Improving the Credibility of the Comp Plan

- It should be used to ensure ongoing accountability among staff and elected officials.
- It should be linked to the budget and CIP.
- It should have buy-in from other city departments.
- It should have provisions for regular review and monitoring.

Zoning

- There should be a stronger mandate for consistency between the Comp Plan and zoning (both on the map and in the regulations).
 Presently, zoning appears to work independently of planning and the Comp Plan.
- Inconsistencies between the Plan Map and Zoning Map need to be corrected to reduce the need for frequent amendments. Comp Plan Map and Zoning Map categories should be more closely related to evaluate consistency.
- The Zoning Map should be consistent with the Ward Plans.
- The Zoning regulations should be updated immediately after the Plan is updated (or concurrently with the Plan update, if possible).

- The PUD designation should be used more judiciously. Policies in the Plan should more clearly define the conditions for using a PUD.
- Additional tools may be needed to ensure Comp Plan consistency (and public input) for developments that are now permitted as a matter of right. We need a way to ensure that the impacts of such projects are adequately mitigated.
- The process needs to be flexible enough to recognize that we can't predict every aspect of the future.
- More regular review of the Comp Plan is needed to measure progress in its implementation.

The CIP & Facility Planning

- The CIP should be an effective tool for implementing the Comp Plan, but it isn't right now
- Public facility planning should also be a step in implementing the Comp Plan.
- At least one of Task Force small group discussions included a suggestion that CIP proposals be reviewed by OP.

Differences of Opinion on: The "Not inconsistent" Provisions in the Current Comp Plan

- → Some believe that these provisions weaken the Comp Plan and allow policy interpretations that are too broad.
- Others believe that these provisions reflect a deliberate strategy, build flexibility into the Comp Plan, and would be difficult to change.

Stakeholder Feedback

A series of external stakeholder interviews (neighborhood, business, institution, and special-interest leaders) was conducted. In addition, focus groups were held with internal stakeholders (District government officials). Their comments on Comp Plan implementation are summarized as follows:

Feedback from External Interviewees

 Many shared that government agencies and officials are unwilling to abide by what has been articulated in the Comp Plan. Some shared that other plans and decisions such as the CIP and changes to the Building Code should be linked to the Comp Plan.

Feedback from Internal (Government) Interviewees

- The Zoning Commission has not kept pace with the changes to the Zoning Regulations called for in recent amendments.
- There should be a focus on public facilities issues in the District and how they might be addressed proactively through the Comp Plan update and a linkage with the CIP.
- Many expressed deep interest in developing coherent and clear priorities across the District's major planning documents.

Consultant Analysis

Zoning

- The zoning regulations are the primary vehicle for implementing the plan's land use policies and priorities, so the relationship of the Comp Plan to the work of the Zoning Commission is very important.
- Stakeholders found that the District's system has merit, but the Zoning Commission has not kept up with changes to the zoning regulations called for in recent updates to the Comp Plan.
- Concerns have surfaced about the Zoning Commission's latitude in implementing the land use recommendations of the Comp Plan, especially in addressing inconsistencies between zoning and the Comp Plan.
- The Comp Plan is weakly linked in law to the actions of the Zoning Commission.

Capital Improvements Plan

 The most common way other jurisdictions set aside sufficient resources to implement Comp Plan priorities is to require a strong link to the priorities of the CIP.

How The Plan Reflects Priorities

- Goals and policies are not tied to priority issues, problem statements, analysis and trends.
- Few goals and policies are explained; most are not. Goals are not prioritized. Lack of priorities makes monitoring of progress toward goals difficult.

Monitoring Progress

 Most objectives lack measurable indicators to track progress in implementation.

Other Cities

The Office of Planning staff researched Comp Plans in other cities to define best practices for planning. These cities included Minneapolis, Denver, Kansas City, Philadelphia, and Baltimore. These cities link the CIP to the Comp Plan, with the Office of Planning

commonly facilitating that process. In some cities, the Planning Commission reviews the CIP before it is formally submitted to the Mayor and City Council.

Office of Planning Recommendations and Task Force Views

Link the Capital Improvement Plan (CIP) to the Comp Plan

This is one of the most fundamental recommendations in this document for strengthening the Comp Plan. In addition to the Zoning Regulations, the District's CIP is a key strategy for implementing the Plan. The Office of Planning would play a formal role in the management and preparation of the CIP to ensure that the Comp Plan's capital investment recommendations are implemented. The CIP should reflect (and be consistent with) the priorities that have been identified in the Comp Plan.

This process would likely work in the following way:

1. Cabinet-level agencies submit preliminary Capital Improvement (CI) proposals to the OP and to the Chief Financial Officer (CFO).

- The Office of Planning collates all CI proposals and assesses them using the Comp Plan. At the same time, the CFO undertakes the financial analysis.
- 3. The Office of Planning prepares a draft document that prioritizes all CI projects based on the Comp Plan.
- 4. This document is submitted to the City Administrator and Deputy Mayors, who use the document as a tool for determining what CI proposals should be recommended to the Mayor and Council for funding.

Preliminary discussions with DC officials suggest that this approach would provide the level of guidance needed to re-orient CIP proposals to better implement the goals and policies articulated in the Comp Plan. Formally instituting this role for OP can be accomplished through Mayor's Order.

Task Force Support for Linking the CIP to the Comp Plan

There was strong support among Task Force members for fully linking the CIP and the Comp Plan. As one task force member put it:

"This is a no-brainer in my estimation."

Some other comments focused on the nature of the relationship between the CIP and the Comp Plan.

One member clarified, "However, the CIP should be a derivative of the specific policies and plans contained in the Comp Plan."

Diverse Viewpoints

None expressed.

Strengthen the Link to Zoning

In the Comp Plan and in the amendment process, provide guidance to the Zoning Commission by identifying priorities for updating the Zoning Regulations (map and text changes). If a Comp Plan update is likely to have numerous implications for the Zoning Regulations, ask the Zoning Commission to consider the feasibility of conducting a major update to these Regulations shortly following Comp Plan adoption.

A concern raised by Task Force members and others focused on the lag time between changes in the Comp Plan and changes in the Zoning Regulations (map and text). The Office of Planning currently addresses these "zoning consistencies" through reports to the Zoning Commission. Over the last year, for example, OP initiated 11 zoning consistency actions. The Office of Planning will continue to dedicate staff and resources to initiating these actions. To help create greater transparency on these actions, OP will submit a zoning consistency

status report to the Zoning Commission and the City Council on a quarterly basis. These status reports will include the list of reports submitted to the Zoning Commission in the last quarter and the reports to be submitted in the upcoming quarter. All zoning consistency status reports will be placed on OP's website for the public to review.

After the Comp Plan has been revised, OP would then consider strengthening the link to zoning by working to change the "shall not be inconsistent" language to "shall be in conformance with" or "shall be consistent with". Strengthening this link would require a change to the Home Rule Charter.

The concept of including Zoning Commission members on a new Planning Commission is another strategy for strengthening this link. This idea, along with the other Planning Commission options, still requires further study.

Task Force Support for Strengthening the Link to Zoning

There was strong Task Force support for ensuring that the Zoning Regulations and the Comp Plan are in the fullest possible alignment. Comments included:

"Zoning currently acts independently of the Comp Plan. There is a need to coordinate the Comp Plan and implementation."

"The over-riding responsibility of the Zoning Commission should be to implement the Comp Plan."

"Good to strengthen links - will improve predictability in the Comp Plan's progress."

"Recommendation to change [the Home Rule Charter] from "shall not be inconsistent" to "shall be consistent" should be included despite the complexity of the issue."

Diverse Viewpoints

A few members sought to clarify certain aspects of this linkage:

"Introduce more certainty for developers, landowners, sellers, ANCs, etc. I like (another member's) suggestion of imposing a sunset on portions of Comp Plan that the Zoning Commission fails to implement in a timely manner."

"Do not reduce the number land use map categories. Specifically translate those categories to the Zoning classifications."

Another Task Force member did not dispute the need for a strong link, but felt the existing link was already sufficient: "I dissent vigorously from the notion that the link is weak now. If you left it alone, it would be perfectly fine."

⁸ These reports act as a petition to begin a rulemaking.

Monitor Plan Implementation and Make Biennial Progress Reports

The District needs to be able to measure success in plan implementation. The Office of Planning should prepare biennial (once every two years) progress reports to track progress and help identify needed amendments. The use of measurable indicators in the Comp Plan would help all understand what progress is being made.

Task Force Support for Monitoring Plan Implementation

There was widespread Task Force support for this recommendation. Comments included:

- "This should be required to monitor ourselves as a check and balance."
- "Commitment from executive (and I assume, Planning Commission) to report on progress seems positive but should be made more practical for staff, who are busy trying to get their "big picture" work done deserves a longer time-frame to reflect the character of the document."
- "This can act as an early detection system to see when the Comp Plan is being ignored."
- "This would be easier with a Planning Commission in place. And it would also give a more public progress report on the implementation of the plan and help keep it a more viable living plan."

Diverse Viewpoints

None expressed.

Assessing How to Improve the Amendment Process

Questions to be Resolved

- How often should the Comp Plan undergo a "major update", based on analysis of issues and trends?
- How often should the Comp Plan be amended?
- What should be the criteria for evaluating the Comp Plan Amendments?
- How should the public review process for amendments work?
- What should be the timing of the amendment process so it does not conflict with elections?

Synopsis of Analysis

Initial Task Force Ideas

During the analysis process, Task Force members were asked for their initial ideas and thoughts regarding the Comp Plan amendment process and how it should be improved. Comments from the members are highlighted below.

The Frequency of Comp Plan Updates and Amendments

 A major, "vision-oriented" Comp Plan update should be conducted every five to ten years to reflect changing issues and conditions. In the interim, amendments that fine-tune the Comp Plan and respond to unforeseen opportunities, should be considered.

The Amendment Submittal Process

- The City Council should not be allowed to submit amendments after the submittal process but this would be difficult to change.
- The amendment cycle should be better coordinated with the City Council's calendar to avoid delays.
- Streamline the public input process so that those coming to community meetings can address all neighborhood issues, not just those relating to a single topic such as transportation or commercial revitalization.
- Must keep residents involved.

The Amendment Review and Approval Process

- The existing process is piecemeal and does not consider the cumulative effects of small changes.
- A separate Planning Commission may be needed to deliberate on land use policy issues and consider the consistency of proposed projects with the Comp Plan. The Zoning Commission should not bear this responsibility.
- The City Council lacks the staff capacity to address Comp Plan issues. One option would be to create a City Council land use officer to advise the Council on planning issues and act as liaison between the Council and OP.

Stakeholder Feedback

A series of external stakeholder interviews (neighborhood, business, institution, and special-interest leaders) was conducted to evaluate the process for amending the Comp Plan. In addition, focus groups were held with internal stakeholders (District government officials) on the Plan amendment process.

Feedback from the External Interviewees

- Process is too long.
- Process turns off most citizens.
- Process should not coincide with election year.

- Not enough analysis or background work completed.
- Role of other agencies unclear.
- Council generated amendments are frequently not subject to public scrutiny or comment.

Feedback from the Internal Interviewees

 Most interviewees were not familiar with the amendment process.

Consultant Analysis

What The Code and Comp Plan Say About Amending the Comp Plan

- Must be done no less frequently than every four years.
- Mayor is allowed to propose amendments as necessary.

In Practice

- Plan amended in 1989, 1994, 1998.
- No amendments proposed between cycles.

Summary of Current Requirements

- Code and Comp Plan specify deadlines and submission requirements.
- Initial public participation process delegated to OP by the Mayor.
- Office of Planning's roles defined in detail.
- Council role less defined.
- NCPC provides federal interest review.

Submitting Amendments

 Anyone can submit during a 90-day open period specified in the "quad-annual" review period. In practice, amendments often are submitted in the name of an organization, although individuals also submit. The Office of Planning and other agencies also generate amendments. The Mayor reviews amendments and OP recommendations. Role of the Legislative Branch According to the Code and Comp Plan

 After the Mayor reviews, amendments are submitted to Council, which holds a public hearing, then revises, adopts or rejects the amendments.

Role of Legislative Branch in Practice

- Hearings are often delayed.
- New amendments are proposed at public hearings.
- After hearings, Council proposes other amendments not subject to hearings or OP review.
- In last two cycles, final action delayed for more than two years.

Summary

- Process takes two years.
- Although NCPC can delay adoption if it finds "harmful impacts on federal interests," this has had minimal impact.
- No amendments have occurred outside the fouryear process.

Other Cities

The Office of Planning staff researched Comp Plans and amendment processes in other cities to define best practices for planning. The research focused on the strengths and weaknesses of those cities' plans and lessons that could be applied to the District in the update of its Comp Plan. The other cities included Seattle, Portland, Minneapolis, Denver, Kansas City, Atlanta, Boston and London. The following provides a summary of what was learned from the analysis.

Kansas City, Denver, and Boston do not have established processes for amending the plan at the current time. Amendment processes in the other cities varied. Atlanta conducts amendments four times a year; Minneapolis has a biennial process, with provisions for making amendments at other times under special circumstances. Seattle has the most well-defined process, with extensive annual review.

In every city that allows amendments, the general public is allowed to submit amendment proposals. Public access to and participation in the amendment process ranged from notifying all residents through household mailings to no attempts to involve the public at all. A few of the cities required Planning Department review of amendments while others allow the Planning Commission or City Council to propose and adopt amendments with fewer requirements for research and review. In Denver, Portland, and Minneapolis, the Planning Commission must review the amendment and recommend it to the City Council for approval. In all cities, the City Council officially approves and adopts the proposed

amendments. Two cities, Seattle and Portland, have defined criteria for accepting amendment proposals; other cities review amendments on a more individual and subjective basis.

Staff time spent on the amendment process varied from one half-time person to continual involvement of the entire planning department of 30 to 60 people. The average number of amendments approved each year ranged from two to 20, with an average of approximately five per city. In all cities, the City Council had full power to propose new amendments and to alter any amendments presented before offering approval.

Office of Planning Recommendations and Task Force Views

Improve the Amendment Process

The Office of Planning recommends that the Comp Plan amendment process be improved to: reduce the overall timeline from beginning to end; increase transparency; and increase the level of analysis required of the proposed amendments. These recommendations fall within four categories:

- The overall timeline for the Comp Plan amendment cycle.
- The process for submitting proposed amendments.
- The process for evaluating proposed amendments.
- The process for approving the proposed amendments.

Overall Timeline

There are two aspects of the amendment timeline that have been revised: 1) the month-to-month timeline for initiating and approving amendments in each cycle and 2) the years when the amendment process should be initiated. To summarize the recommendations:

- While the existing process is 24 months long, the proposed amendment cycle will take approximately 20 months from the onset of public outreach to the Congress and NCPC review.
- Based on the work program outlined in Figure 1
 of this report, the Comp Plan is to be revised and
 formally adopted by early 2006. After this
 revision, the plan amendment cycle would be
 initiated after two years and then every four
 years thereafter.

Both sets of recommendations are explained in further detail:

The Timeline Within One Amendment Cycle What primarily drove this recommendation was determining the appropriate timeframe in which Council should receive an amendment proposal.

Therefore, this recommendation has Council receiving proposed amendments in May, after the budget cycle, to avoid delays related to budget hearings. The recommendation assumes that Council's public hearings would take place in early June. Council could take their first legislative action (first reading) in early Summer or Fall. If new amendments are proposed during this process, voting will be deferred so that OP can complete its analysis for the Council. This analysis could be done in the summer while Council is in recess (if a Planning Commission is created then it would also hold a public hearing on the new amendments).

The details of the revised timeline for the amendment process are as follows:

- May-Aug: The Office of Planning conducts extensive public outreach to inform the public of the opportunity to submit amendments.
- Sept 15: Deadline for submitting proposed amendments to the Office of Planning.
- Sept-Nov: Initial screening of the proposed amendments by the Office of Planning to ascertain whether or not they are issues that can be addressed in the Comp Plan. The Office of Planning would hold a public meeting to publicize what proposed amendments had been submitted. [If a Planning Commission is created then OP staff would recommend to the Planning Commission which proposed amendments should be considered. The Planning Commission would then hold a public hearing.]
- Dec-Feb: OP coordinates the technical/policy analysis of the proposed amendments. OP then prepares an "Amendment Report and Recommendations". [If there is a Planning Commission then OP would submit the report to the Planning Commission]
- Mar-April: Recommendation to the Mayor and Council. [If there is a Planning Commission then it would convene a hearing and develop

recommendations before proposed amendments are sent to the Mayor and/or Council]

- May-September: Council holds public hearings in June and takes final action by September. If new amendments are proposed as a result of public hearings, these are forwarded to OP for analysis during Council's summer recess.
- October: After Council action, the Mayor may approve or veto the Council-approved Comp Plan amendments.
- Nov-Dec: After Mayoral approval, Congressional review (30 days) and NCPC review (60 days) run concurrently. If no changes are requested, then the amended Comp Plan is formally adopted.

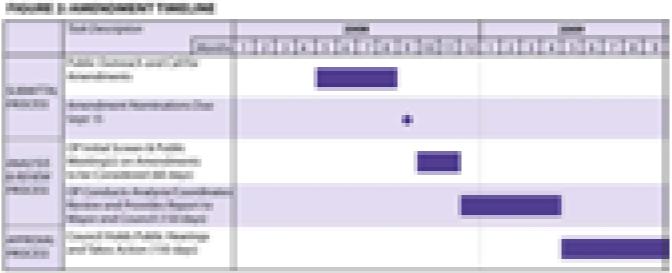
Figure 2 shows the timeline for the round of formal amendments that would follow the major revision now being recommended. These amendments would occur in 2008-2009. 9

The Years When the Amendment Process Should be Initiated

This recommendation creates a schedule where amendments are not considered during Mayoral and Council elections. This schedule is illustrated in Figure 3 on the next page. Note that initiation of an amendment cycle is recommended only two years after the Comp Plan has been revised. There are

two reasons for this: 1) amendments may be necessary soon after the revision to address unanticipated issues associated with new language in the Comp Plan, and 2) to make the amendment cycle fall appropriately between election cycles. Although the amendment process starts while some Council members are in elections, Council review and adoption does not take place until well after the elections are over (during the second year of the amendment process).

Additionally, the current four-year amendment cycle does not contemplate periodic major updates to the Comp Plan. An update to the Comp Plan is a more intensive effort than the amendment process, as whole sections of the Comp Plan would likely be rewritten, based on the analysis of current data and challenges. Based on the schedule illustrated in Figure 3 on the next page, OP recommends that there would be a major update every 12 years. The review of the practices of other major cities suggests that a 10 to 15 year cycle for major updates to the Comp Plan is appropriate. The major update would reassess all Comp Plan policies, including citywide and area plan policies. It would not necessarily include a "redo" of each Area Plan; the focus would be on deleting outdated or irrelevant policies, and editing or adding policies to reflect emerging issues in each area.



⁹ Amendments could occur outside the regular cycle prior to 2008-2009, (if new Area Plans are adopted by Council between 2006 and 2008).



Submittal Process

The Comp Plan amendment process provides an opportunity for individuals, groups, or city agencies to propose a change to the District's Comp Plan to address changes in conditions and to reflect ongoing work or new information. Proposed changes can include changes to the text or maps of the Comp Plan. Recommendations for improving the submittal process include creating a firm deadline for submission and strengthening the level of analysis required of proposers.

All applications for proposed amendments would need to be submitted to OP by the firm deadline of September 15. This firm date will let the public know that this will always be the deadline.

In terms of the information submitted by proposers, demonstration that a change to the Comp Plan is required would lie solely with the applicant/proposer. The greater the degree of change proposed, the greater the burden of showing that the change is justified. The answers to the questions will be used to evaluate each request. In addition to name, address and contact information, the required supporting information will be required:

• If applicable, describe in words the location/general area that would be affected by the proposed change.

- Provide a detailed description and explanation of the proposed text/map amendment. Include the text and the specific language to be amended.
- Describe how the issue is currently addressed in the Comp Plan. If it is not addressed, describe the public need for it.
- Why is the proposed change the best means for meeting the identified public need? What other options are there for meeting the identified public need?
- What do you anticipate will be the impacts caused by the change in text, including the geographic area affected and the issues presented? Will the proposed change result in a net benefit to the city? If not, what type of benefit can be expected and why?
- How would the proposed change comply with the community [vision statements, goals, objectives, and policies] of the Comp Plan? Include any data, research or reasoning that supports the proposed amendment.
- Is there public support for this proposed amendment (for example, has the proposal been discussed at a public meeting, such as an ANC meeting)?

Analysis and Review Process

The key aspects of this process that have been strengthened are: 1) providing the public with opportunities to review and discuss the proposed amendments prior to submission to Council and 2) providing greater clarity on the responsibilities and roles of the District. The details of this phase of the amendment process follow:

Initial Screen

The Office of Planning screens the proposed amendments. This first screen is a quick assessment to determine which proposed amendments are not proper subjects for inclusion into a Comp Plan (such as operating, budget or legislative matters). OP will then hold a public meeting to share initial findings with the public. [If a Planning Commission were created it would then hold a hearing to discuss the proposed amendments, including those that are determined to not be appropriate for the Comp Plan.] OP would then conduct analysis on proposed amendments that are determined to be appropriate.

Technical/Policy Analysis

OP analyzes the amendments and also coordinates the review of the proposed amendments with other District agencies. After collecting comments from other agencies, OP staff will make a recommendation that includes a detailed analysis. Staff will then provide a "Proposed Amendments Report and Recommendations" and submit this report to the Mayor and the Council. [If a Planning Commission were created, then the Commission would hold a hearing and develop recommendations, which would then be sent to the Mayor and/or Council.]

Approval Process

City Council Review and Adoption

Council Committee of the Whole (Committee)
holds a public hearing to receive comments on
proposed amendments submitted by the Mayor.
Any new or significantly modified amendment
proposals are sent to the Office of Planning to
conduct technical analysis and formulate
recommendations.

- Once recommendations are provided, the Committee then holds a meeting to consider and vote on which amendments should be adopted (the Council Chairman develops an initial recommendation for the Committee to review).
- 3. Following approval by the Committee of the Whole, Council would then consider and vote on an amendment package in at least two legislative meetings (first and second readings) no less than two weeks apart. Any new or significantly modified amendment that is generated during any of these readings would be required to be accompanied by planning analysis and recommendation prior to the Council taking final action on the amendment.
- 4. If a new or significantly modified amendment substantially changes the form of the Comprehensive Plan legislation, the Council would then schedule another reading on the legislation at least two weeks later (this could mean that Council holds a third reading).

Mayoral Approval

The Mayor takes action to approve or veto the amendments.

Federal Review

The District-approved amendments are forwarded to Congress for a 30-day review period and to NCPC for a 60-day review period to assess potential negative impacts of each amendment on the federal interest.

Task Force Support for Improving the Amendment Process

A majority of the Task Force believes that improving the amendment process is one of the keys to success. Comments included:

- "We need more predictability to believe that we as citizens can be effective in the process."
- "What ever time span is established, it needs to be enforced with possible penalties if the time-frame is not met."
- "Important to make this function smooth and efficient."
- "Regular updates keep the plan "alive"."
- "It's why I am serving on this Task Force. I need to think more about it, but I think (another member's) idea of DC Council review of amendments coming forward from Planning Commission (resolution up/down) has a great deal of merit."

Diverse Viewpoints

One Task Force member commented:

"This is a troublesome question. It's not the process that's the problem, it's the Plan. It's so vague without work lists and details that it can't be reported on, or OP refuses to make reports on progress. The process for amendment should be no different than it is now unless there is no mechanism in place, such as a Planning Commission, to deal with issues that might involve amendments."

Considering the Merits of a Planning Commission

Questions to be Resolved

- Should there be a Planning Commission in the District of Columbia?
- What would their role be?

 What would be the role of Zoning Commission if a Planning Commission is created?

Synopsis of Analysis

Initial Task Force Ideas

During the analysis process, Task Force members were asked for their initial ideas and thoughts about having a District Planning Commission. Comments from the members on the role and composition of a Planning Commission are highlighted below.

- Should have a Planning Commission without the Architect of the Capitol and the National Park Service.
- Have a Planning Commission that provides a regular and defined process for the Comp Plan and related plans and has the capability to enforce Comp Plan implementation.
- Location and design review by a City Planning Commission for all city facilities makes sense.
- Would it just be another level of bureaucracy or would it help City Council or the Mayor address land use issues?
- Planning Commission should review plan amendments, hold public hearings, and make recommendations to Council.
- Having a Planning Commission could improve the timeliness of the amendment process.
 Council has all other kinds of legislation to deal with
- Planning Commission should have one member of the Council and the Mayor on it.

Stakeholder Feedback

A series of external stakeholder interviews (neighborhood, business, institution, and special-interest leaders) was conducted to determine how to improve the Comp Plan process.

Feedback from the External Interviewees

 When asked how to improve the Comp Plan process, several interviewees recommended a Planning Commission to improve linkages and make informed decisions.

Consultant Analysis

The Consultants analysis found that:

- Planning Commissions exist in most major cities in the United States. In fact, 28 of the nation's 30 largest cities have planning commissions. These commissions play a crucial role in both shaping and advancing planning in urban areas.
- Planning Commissions in these cities serve as an independent voice on planning, help further public discussion and debate on planning issues, and provide detailed guidance to the Mayors and the City Councils.
- Such a body would be particularly relevant in this city, where hundreds of Comp Plan amendments are now subject to Council review.

- The Planning Commission would review the proposed amendments and provide guidance and insight to the Mayor and City Council.
 Because the Mayor and Council's focus is on a broad range of other major issues, they may not have the ability to focus as much on the substance and details of the amendments, as would a Planning Commission.
- Planning Commissions are usually appointed by elected officials and are primarily responsible for working with the community on the Comp Plan and making recommendations to the elected body. In the vast majority of the country's largest cities, the Planning Commission also makes recommendations on zoning actions and the zoning regulations.
- In some cities, the Planning Commission also considers and makes recommendations on the CIP.

Other Cities

The Office of Planning researched the role and use of Planning Commissions in other cities to define best practices. Those cities included Seattle, Portland, Minneapolis, Denver, Kansas City and Atlanta. This research found that that Planning Commission members are appointed and make recommendations to the City Council on planning matters. In some cases the Planning Commission makes recommendations on zoning, development cases, and capital projects in addition to the Comp Plan and Plan amendments. In most cities, Planning Commissions are seen as essential to promoting public involvement and advancing good planning practices and policymaking.

Office of Planning Recommendations and Task Force Views

Evaluate the Merits of a Planning Commission

A Planning Commission is an appointed citizen body that guides and supports planning and related decisions in a community. Almost every major city in the U.S. has a Planning Commission, a convention that emerged out of several civic reform efforts in the early 20th century. A Planning Commission in the District would help ensure that proposed plans are adequately reviewed and understood by the public before they are adopted. The Planning Commission would offer an independent voice in making recommendations to the Mayor and/or Council on Comp Plan updates and amendments. It would also make recommendations on related plans (including Area Plans) and review the Federal Elements of the Comp Plan and the federal CIP to assess District impacts. The Office of Planning would provide the necessary support to the Planning Commission.

What the Commission would not do, however, is usurp the role of the Mayor and/or Council in any way. Rather, the Commission is intended to organize information and develop well articulated recommendations in a way that makes it easier for Mayor and/or Council to make their decisions.

The Office of Planning has had substantial discussions with the Office of Corporation Counsel on how a Planning Commission could be created in the District. Based on this preliminary research, more study is recommended, continuing beyond the time allowed for this assessment. Several options have emerged in these discussions that will the subject of additional study. These are outlined in Chart 3.

CHART 3: PLANNING COMMISSION OPTIONS	IMISSION OPTIONS			
Option	How Enacted	Kind of Power	Benefits	Challenges
Expand Zoning Commission to include Planning Commission functions	Zoning Commission responsibilities expanded by Council to carry out Comp Plan; Responsibilities are delegated to Commission by the Mayor (chief planner for the city).	Depends on Mayor: Mayor may decide to keep power (Planning Commission is advisory and makes recommendations to Mayor). OR Mayor may decide to delegate Comp Plan responsibilities to Planning Commission (Commission makes recommendations directly to Council).	Tightens relationship between planning and zoning. Zoning Commission has ownership of plans; smooth transition into implementation.	Only the three District Zoning Commissioners (not the federal members) will participate in Planning portion of the Planning/Zoning Commission –what if one is absent? Increased workload for Zoning Commission; possibly need to increase time commitment and compensation. Timeline for when/if this could become enacted is not certain.
2. Planning Commission that includes the three District appointees of Zoning Commission	Planning Commission established by Council. Council stipulates that all future Mayoral appointees to Zoning Commission also serve on Planning Commission.	See above.	Greater number of people on the Planning Commission. Zoning and planning overlap (mentioned above). Expanded membership creates greater expertise in planning.	Still heavy burden on existing Zoning Commissioners. May need to increase time commitment and compensation. Need support of Council. Timeline for when this could become enacted is not certain.
3. Planning Commission includes a member of the Zoning Commission (e.g., the Chair)	Planning Commission established by the Mayor. Mayor can appoint Zoning Commission member to PC, but member can decline appointment.	Like option above, Mayor would determine powers.	Less burden on the Zoning Commission as a whole. Provides some overlap between zoning and planning. Easily established by Mayor. Members can be sought with expertise in planning.	Zoning Commission may not accept appointment. Less zoning/planning integration.
4. Completely separate Planning Commission (no Zoning Commission representation)	Planning Commission established by the Mayor. Council can confirm appointments if desired.	As in options above, Mayor would determine powers.	Easily established by the Mayor. Planning Commissioners will be solely dedicated to planning; no Zoning Commission responsibilities.	Lack of membership overlap creates challenge to integrate planning and zoning. If no powers are delegated from Mayor, utility of the Planning Commission is diminished.
5. Expand the role and size of the Zoning Commission to become Planning and Zoning Commission	Amend the Home Rule Charter to increase membership, change name, and add function.	Power could be delegated by Mayor or could also amend Charter to take on Comp Plan responsibilities.	Expanded membership creates complete zoning/planning overlap; ownership of plans. Addresses issues of size—more than three members.	Amending the Charter will likely be a timely and challenging process. Still need to address issues of workload.

Task Force Support for Exploring the Merits of a Planning Commission

There was strong support for the idea of Planning Commission but lingering concerns about a number of issues--including its relationship to the Zoning Commission (or whether it should be merged with the Zoning Commission) and the role of Council in Comp Plan amendments (should amendments be forwarded to the Council as resolutions for an up/down vote).

Task force views included:

- "Need an independent planning organization separate from the Mayor's Office and Zoning Commission. Should be a strong Commission capable of holding administration hearings and approving/rejecting development applications. Would separate the planning and zoning commissions."
- "From the viewpoint of a former DC Council staff, I understand how easily "special interests" can influence the amendment process. A Planning Commission would have expertise and technical assistance from trained staff; from standpoint of both executive and legislative, would be good to make it a less political (and therefore volatile) process."
- "Probably the most important part of this whole process. The BZA and Zoning Commissions are acting as a de facto planning commission. Planning Commission is the most democratic platform for land use disputes."
- "Even if we start with a weak one it will be a move towards independent planning."

Diverse Viewpoints

A few Task Force members expressed concern or opposition:

- "Really not certain about this recommendation. Is it really necessary? Who will serve on the Commission? Will this introduce another layer of "politics"?"
- "Only if it has role in deliberations on specific development proposals and removes City Council from planning and zoning deliberations and decisions."
- "Is the Planning Commission to be an advisory body to OP, the Mayor, and the Council or is it to have some teeth, which makes it a role player in the plan adoption and amendment process? Is the Planning Commission limited to providing advice on Comp Plan amendments and updates or will it have a broader ongoing role? Is the Commission going to have its own independent staff or is it going to rely on OP?"

Next Steps

V. NEXT STEPS

To implement the recommendations outlined in this report, OP has detailed the following next steps for this year:

March-June 2003

Assessment

Discussion of Comp Plan recommendations at OP's budget hearing in the afternoon of April 4, 2003 in the Council Chambers.

Research

Hold meetings with the Office of Corporation Counsel to flesh out the legal issues with the Planning Commission (role, status, etc). Meet with Committee of 100 to discuss the details of their proposal.

Legislative and Mayoral Order Actions

Draft, revise and submit Mayor's Order for linking the CIP to the Comprehensive Plan. The Office of Planning will work with the Office of the City Administrator, the Office of Policy and Legislative Affairs, and the Office of Corporation Counsel to develop this Order.

Vision and Policy Framework

Draft, revise and submit scope-of-work language to solicit proposals from consultants, who will work with OP on the vision and policy framework.

Begin and complete significant portions of data collection and analysis, which will be used for the vision and policy framework as well as for the first stages of the Comp Plan revision.

Develop and begin to implement public involvement strategy for the vision and policy framework.

Other

Submit Comprehensive Plan Land Use Progress Report: Progress on FY 1999-2002 and Projected Progress for FY 2003-2006.

July-December 2003

Vision and Policy Framework

Complete the Framework, working with the public, DC agencies and others.

Research

Continue to discuss the legal issues associated with the Planning Commission (role, status, etc); work with Mayor and Council to determine approach and feasibility. Consider a public or City Council roundtable, or other means for public discussion, on ideas/options. Based on this work, determine necessary next steps.

